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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

**BOARDS OF TRUSTEES OF THE
AGC-OPERATING ENGINEER
HEALTH AND WELFARE FUND;
OPERATING ENGINEERS PENSION
FUND; and INTERNATIONAL UNION
OF OPERATING ENGINEERS LOCAL
701-AGC TRAINING TRUST FUND,**
Plaintiffs,

v.

**ROSS ISLAND SAND & GRAVEL
CO, an Oregon Corporation, Oregon
Registry No. 029100-16,**

Defendant.

NO. 3:23-cv-001613-MO

WRIT OF GARNISHMENT

TO: **City of Portland**

You are now a Garnishee. AS A GARNISHEE, YOU NEED TO KNOW THE
FOLLOWING:

WRIT OF GARNISHMENT - 1
3:23-cv-001613-MO

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Ross Island Sand & Gravel Co. (“Debtor”) owes money to the Boards of Trustees of the AGC-Operating Engineers Trust Funds (“Creditors”). A judgment was entered against the Debtor for the debt, or the debt otherwise became subject to garnishment, on April 5, 2024. The Debtor’s employer identification number(s) is unknown.

The amount subject to garnishment is \$88,371.68. This writ garnishes all of the following:

- Wages that you owe the Debtor at the time this writ is delivered to you, and all wages that the Debtor earns during the 90-day period following the date on which you receive this writ.
- All property of the Debtor (including money) that is in your possession, control or custody at the time this writ is delivered to you.
- All debts that you owe the Debtor at the time this writ is delivered to you, whether or not payment is due on the debt at the time you receive this writ.

YOU MUST ANSWER THIS WRIT BY COMPLETING THE ATTACHED GARNIShee RESPONSE WITHIN THE TIME ALLOWED BY LAW, WHETHER OR NOT YOU HOLD ANY OF THE DEBTOR’S PROPERTY OR OWE ANYTHING TO THE DEBTOR. IF YOU DO NOT TRUTHFULLY ANSWER THIS WRIT, OR YOU DO NOT DELIVER MONEY OR PROPERTY WHEN YOU ARE REQUIRED TO DO SO, YOU WILL BE LIABLE TO THE CREDITOR.

WRIT OF GARNISHMENT - 2
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If you have questions, you should contact an attorney. Court employees cannot give you legal advice. The Creditor's attorney cannot give you legal advice.

A writ of garnishment may be issued only by the court administrator, by the attorney for the Creditor or by a person who is specifically authorized by law to issue garnishments. This writ is issued by

Clerk of the Court
United States District Court of Oregon
Mark O. Hatfield U.S. Courthouse
1000 SW Third Avenue
Portland, Oregon 97204

This writ is valid only if it has been delivered to you within 60 days after the date of issuance. If the court administrator is issuing this writ, the date of issuance is the date the court administrator signs the writ.

DEBTOR:

Ross Island Sand & Gravel Co.
c/o Randall H. Steed, President
14911 SE 82nd Drive
Clackamas, OR 97015

CREDITORS:

AGC-Operating Engineers Trust Funds
c/o Barlow Coughran Morales & Josephson
1325 Fourth Avenue, Suite 910
Seattle, WA 98101

ATTORNEY FOR CREDITORS:

Noelle E. Dwarzski, OSB #131866
Barlow Coughran Morales & Josephson
1325 Fourth Avenue, Suite 910
Seattle, WA 98101

CERTIFICATION

I certify that I have read this writ of garnishment and to the best of my knowledge, information and belief, there is good ground to support issuance of the writ, and the amount indicated as subject to garnishment is lawfully subject to collection by this writ.

DATED this 14th day of May, 2024.

s/ Noelle E. Dwarzski
Noelle E. Dwarzski, OSB #131866
BARLOW COUGHRAN MORALES
& JOSEPHSON, P.S.
Attorneys for Plaintiffs/Creditors

COURT SEAL

Issued by the court administrator on _____.

COURT ADMINISTRATOR

By _____

WRIT OF GARNISHMENT - 4
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